

04/24/2021

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

Vs.

Jon Bolduc  
Celerino Juarez-Cruz

CRIMINAL COMPLAINT

Case Number: 2:21-MJ-479

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about April 23, 2021 in Brooks County, in the

(Date)

Southern District of Texas, defendant,

Jon Bolduc  
Celerino Juarez-Cruz

each aiding, abetting and assisting one another, did knowingly or in a reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law, transport, or move or attempt to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law

in violation of Title 8 United States Code, Section(s) 1324  
I further state that I am a(n) Border Patrol Agent and that this complaint is based on the  
following facts:  
Official Title

See Attached Affidavit of U.S. Border Patrol Agent

David Stone

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P.4.1, and probable cause found on the:

Signature of Complainant

David Stone

Printed Name of Complainant

April 24, 2021

Date

at

Corpus Christi, Texas

City and State

Jason B. Libby U.S. Magistrate Judge

Name and Title of Judicial Officer

Signature of Judicial Officer

## **AFFIDAVIT**

The information contained in this report/affidavit is based upon my personal participation in the investigation, which included, but is not limited to information relayed to me by other agents and officers participating in the investigation.

### **SYNOPSIS:**

On April 23, 2021, Jon BOLDUC and Celerino JUAREZ-Cruz were arrested at the Falfurrias, Texas Border Patrol Checkpoint attempting to smuggle four illegal aliens.

### **ENCOUNTER:**

At approximately 12:00 p.m., Border Patrol Agents assigned to the Falfurrias, Texas Border Patrol Checkpoint observed a Toyota RAV4 approach the primary lane for inspection. The agent observed three occupants in the vehicle.

The agent asked the driver, later identified as Jon BOLDUC, where he was going and he replied, "Back home." The agent asked BOLDUC where he was coming from, and the backseat passenger, later identified as Carlos RONQUILLO-Aguirre, replied, "Houston." The agent observed the front seat passenger, later identified as Celerino JUAREZ-Cruz, seemed to be excessively fidgeting while filming the agent with his phone. The agent asked JUAREZ if he had any identification. JUAREZ reached in his pocket for his wallet but stated, "I can't find it, we were out partying last night." At that point the agent referred the vehicle to secondary inspection.

Once in secondary, agents questioned JUAREZ and RONQUILLO as to their citizenship. Both subjects admitted to being citizens of Mexico and Guatemala, illegally present in the United States. During a search of the vehicle, agents discovered three more subjects concealed under a blanket in the rear cargo area. The three subjects were interviewed and admitted to being illegally present in the United States. All subjects were placed under arrest and escorted inside the checkpoint.

### **MIRANDA RIGHTS**

BOLDUC and JUAREZ were read their Miranda Rights in the English language. Subjects stated they understood their rights. BOLDUC was willing to provide a statement without the presence of an attorney. JUAREZ refused to provide a statement without the presence of an attorney.

The material witness was read his Miranda Rights in his preferred language of Spanish. Subject stated he understood his rights and was willing to provide a statement without the presence of an attorney.

### **PRINCIPAL STATEMENT (Jon BOLDUC)**

BOLDUC stated he left his home in Tampa, Florida and drove straight to McAllen, Texas with the intention of smuggling illegal aliens for monetary gain. BOLDUC stated the front seat passenger, JUAREZ, organized the smuggling arrangements and agreed to split the \$10,000 he would earn with BOLDUC. After arriving in McAllen, they spent the night at a Motel 6. BOLDUC stated the next morning a man arrived and spoke with JUAREZ outside. A short time later, JUAREZ entered the room and informed BOLDUC they were, "ready to go." BOLDUC stated there was a man already in the vehicle when they began driving north.

**MAT/WIT STATEMENT (Carlos RONQUILLO-Aguirre)**

RONQUILLO stated, after crossing illegally into the United States, he was taken to a house for a few days. RONQUILLO was then moved to a warehouse. RONQUILLO stated he was picked up from the warehouse and taken to a car wash. At the car wash, RONQUILLO was instructed to enter the vehicle he was arrested in. RONQUILLO stated the driver told him to ride in the back seat because he could speak English. RONQUILLO stated the driver and front seat passenger concealed the other three aliens in the back of the vehicle. RONQUILLO was shown a photo lineup and positively identified BOLDUC as the driver of the vehicle.

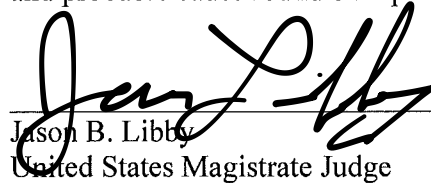
**DISPOSITION:**

The case was accepted by the Assistant United States Attorney's Office against Jon BOLDUC and Celerino JAUREZ-Cruz for prosecution of Title 8 USC 1324, Alien Smuggling. Carlos RONQUILLO-Aguirre will be held as a material witness in this case.



David Stone  
Border Patrol Agent

Submitted by reliable electronic means, sworn to,  
signature attested telephonically per Fed.R.Crim.P.4.1,  
and probable cause found on April 24, 2021.

  
Jason B. Libby  
United States Magistrate Judge